drago, helene

From: Voigt, Gregory

Sent: Wednesday, April 10, 2013 7:26 AM drago, helene; Gaige, Elizabeth FW: TMDL WLA question

Gregory Voigt USEPA, Region III 1650 Arch Street Philadelphia, PA 19103 215-814-5737

From: Jessica Bier [mailto:bierjessica@hotmail.com]

Sent: Wednesday, April 10, 2013 7:20 AM

To: O'Quinn, Joey (DMME)

Cc: Voigt, Gregory

Subject: RE: TMDL WLA question

Joey,

Thanks. Could you send me any information you have/receive that clarifies the calculation of the WLAs?

If monitoring is almost completed, does this mean the plans for the TSS monitoring were dropped?

Jessica

From: Joey.O'Quinn@dmme.virginia.gov

To: bierjessica@hotmail.com
Subject: RE: TMDL WLA question

Date: Mon, 8 Apr 2013 15:57:01 +0000

Hi Jessica,

I will contact MapTech, Inc. and determine if a better description of wasteload allocations in the SF Pound TMDL is available.

Monitoring for the phased TMDLs is nearly completed and the results will be shared with stakeholders at the meeting. In addition the meeting will include a discussion of any planned revisions to the phased TMDLs based on the monitoring results.

I think DEQ will post information and presentations after the meeting – for those unable to attend and to solicit additional public feedback.

George Joey O'Quinn, VCO Reclamation Program Manager Division of Mined Land Reclamation Virginia DMME 276-523-8179 From: Jessica Bier [mailto:bierjessica@hotmail.com]

Sent: Saturday, April 06, 2013 3:25 PM

To: O'Quinn, Joey (DMME)

Cc: <u>voigt.gregory@epamail.epa.gov</u> **Subject:** RE: TMDL WLA question

Joey,

I appreciate your response.

In reference to your answer to my question about why the TMDLs included WLAs for a permit without discharge, I am still confused.

In the 2011 TMDL addendum and the EPA's Decision Rationale, the methodology indicated nothing about distributing loads according to mine surface area:

"To calculate the TDS loads generated from each mining permit, the average annual flows delivered from each permitted discharge was multiplied by the water quality endpoint for TDS (369 mg/l). The Department of Mines, Minerals and Energy (DMME) provided the average annual flows for the permitted discharges."

Is it possible there was something wrong in the data provided by DMME or a mistake in the calculations?

If the waste load allocations were distributed according to surface area, were any variables (other than acreage), taken into account? Is a more complete description of methodology used to calculate WLAs for individual permits available?

I am confused about the upcoming public meeting and comment on the revised TMDL. When I met with you last fall, the additional monitoring proposed by MapTech had not been started. Have those efforts been abandoned? Is comment being solicited on a finalized draft (2nd phase) of the TMDL?

Thanks, Jessica

From: Joey.O'Quinn@dmme.virginia.gov

To: bierjessica@hotmail.com

Subject: RE: TMDL WLA question Date: Wed, 3 Apr 2013 20:27:41 +0000

Hi Jessica,

It is my understanding that the interim annual wasteload allocations in the SF Pound TMDL report were generated by MapTech using real discharge data provided by DMLR and then distributed according to mine surface area.

The individual annual wasteload allocations are summed to produce the transient mining wasteload allocation for the watershed. We compare aggregated mining wasteloads to transient mining wasteload allocations for permitting & enforcement purposes.

A public meeting has been scheduled by Virginia DEQ for Thursday evening, April 25th. It will be held at the DEQ SWRO in Abingdon from 6 pm until 8 pm. The meeting is scheduled to share the results & status of monitoring – and describe what revisions to the four phased coalfield TMDLs are planned based on the monitoring results. Public comment will be solicited.

I am waiting to hear from Dr. Jim Kern with MapTech about the use of data being collected from Bull Creek.

George Joey O'Quinn, VCO Reclamation Program Manager Division of Mined Land Reclamation Virginia DMME 276-523-8179

From: Jessica Bier [mailto:bierjessica@hotmail.com]

Sent: Tuesday, April 02, 2013 5:29 PM

To: O'Quinn, Joey (DMME) **Subject:** TMDL WLA question

Joev-

I received a reply letter (February 27) to a comment I submitted on Application 1007436 and Mr. Casey said you were the contact if I had any questions about the responses.

The response states, "The TMDL mining waste load allocation (WLA) to the South Fork Pound River that was given to permit 1600876 was based on its surface acreage..."

I thought I had a grasp on how the WLAs were calculated. It was my understanding that the WLAs, for both TSS and TDS, in the 2011 SF Pound TMDL report addendum and the TMDL Decision Rationale were based on real flow data from the NPDES discharges. Is this not correct?

Could you please clarify?

Has there been any implementation of the additional monitoring (besides the Bull Creek deep mine

discharges) in the phased TMDL watersheds? I am still interested in the process and would appreciate any updates you can provide.

Thank you, Jessica